

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

FREEDOM FROM RELIGION FOUNDATION, INC.,
DAN BARKER AND ANNIE LAURIE GAYLOR,
CO-PRESIDENTS OF FFRF,

Plaintiff,

v.

Case No. 17-CV-330

DONALD TRUMP, PRESIDENT
OF THE UNITED STATES; and
JOHN KOSKINEN, COMMISSIONER
OF THE INTERNAL REVENUE SERVICE,

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS FOR LACK OF SUBJECT
MATTER JURISDICTION OR FOR FAILURE TO STATE A CLAIM**

The Plaintiffs respectfully request that the Court extend by eleven days the time for Plaintiffs to respond to Defendants' Motion To Dismiss For Lack Of Subject Matter Jurisdiction Or For Failure To State A Claim and in support thereof submit the following:

1. The Defendants filed a Motion To Dismiss For Lack Of Subject Matter Jurisdiction Or For Failure To State A Claim on November 10, 2017.
2. The Plaintiffs' response to the Motion is due on November 30, 2017.
3. Since November 10, 2017, counsel for the Plaintiffs has been extensively involved in responding to discovery in Case No. 3:16-CV-829, and also participated in a day-long mediation and preparation in said case.
4. Counsel for the Plaintiffs has also been extensively involved in preparing pleadings in a new matter with impending statute of limitations deadline.

5. Counsel also had out-of-state commitments on November 20 and November 21, returning to the office early afternoon on November 22, 2017.

6. Due to extensive briefing, as well as other matters on counsel's docket, including matters pending in the District Court for the District of Columbia and the Western District Court in Texas, this request is made for an additional eleven days to respond to the pending motion in this matter.

7. Counsel for Plaintiffs has discussed this request with counsel for the Defendants, who does not object.

8. Plaintiffs accordingly request that the response to the pending motion be extended from November 30, 2017 to December 11, 2017.

9. This motion for extension will not otherwise affect any pending scheduled activities in this matter, which has not been set for trial.

10. For good cause shown, Plaintiffs' request that the Court extend the time allowed for the Plaintiffs to respond to the pending motion to December 11, 2017.

Dated this 28th day of November, 2017.

BOARDMAN & CLARK LLP

By

/s/ Richard L. Bolton

Richard L. Bolton

Wisconsin State Bar No. 1012552

One South Pinckney Street, Ste. 410

Madison, WI 53701-0927

Telephone: (608) 257-9521

Facsimile: (608) 283-1709

Attorney for Plaintiffs

rbolton@boardmanclark.com

CERTIFICATE OF SERVICE

I certify that, on November 28, 2017, service of the foregoing was made upon all parties by filing it with the Clerk of Court using the CM/ECF system.

/s/ Richard L. Bolton

f:\docs\wd\26318\38\2957178.docx